



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
OREGON OPERATIONS OFFICE
811 S.W. 6th Avenue
Portland, Oregon 97204

February 11, 2004

Mr. Jim McKenna
Port of Portland & Co-Chairman, Lower Willamette Group
121 NW Everett
Portland, Oregon 97209

Mr. Robert Wyatt
Northwest Natural & Co-Chairman, Lower Willamette Group
220 Northwest Second Avenue
Portland, Oregon 97209

Re: Portland Harbor Superfund Site; Administrative Order on Consent for Remedial
Investigation and Feasibility Study; Docket No. CERCLA-10-2001-0240
RI/FS Work Plan

Dear Messrs. Wyatt and McKenna:

We have completed our review of the Revised Draft Final Programmatic Work Plan (Work Plan), dated November 13, 2003. This document is a major improvement over previous drafts and has addressed a number of the issues raised in our July 25, 2003 comment letter. Additionally, because EPA has agreed to allow the Respondents to produce additional technical memoranda, there are only a few significant issues remaining. Attached to this letter are EPA's comments that need to be addressed prior to EPA approval of the Work Plan.

In order to expedite completion of the Work Plan approval process, EPA would like to use a different revision process that would help achieve final approval of the Work Plan no later than 30 days from receipt of these comments. Rather than submit all of the Respondents' proposed changes in a revised Work Plan within 30 days, Respondents shall provide all revisions to the specific sections/pages in the Work Plan in response to EPA comments prior to a scheduled meeting with EPA. This approach is in lieu of requiring resubmittal of another complete draft of this document that would need to go through the review/comment cycle. EPA will then meet with Respondents to discuss revisions.

We would like to meet with the Respondents to resolve EPA's comments no later than March 3, 2004. Therefore, EPA requests that the Respondents provide its revisions to the Work Plan at least 5 days prior to the meeting. We believe this revision schedule is reasonable, because EPA has provided specific language modifications for a number of comments. The meeting discussions then should generally be limited to comments and issues where EPA did not provide Respondents with specific language in the comments. We propose to use the meeting time to work through the Respondents' proposed changes and, hopefully, reach agreement on the needed modifications.

Please note that a key element that needs to be resolved before final approval of the Work Plan is the project schedule. EPA discussed some of our initial concerns with the Respondents' proposed project schedule at our February 5, 2004 meeting. We must continue to work together to develop an acceptable schedule for the RI/FS so the schedule can be incorporated in the Final Work Plan.

If you do not agree to use the process as outlined above, please inform us within 3 days of your receipt of this letter. In that event, Respondents must revise the draft Work Plan to respond to all comments and resubmit the complete Work Plan no later than 30 days from your receipt of these comments. If you have any questions, please call Chip Humphrey at (503) 326-2678 or Eric Blischke (503) 326-4006. All legal inquiries should be directed to Lori Cora at (206) 553-1115.

Sincerely,

Chip Humphrey
Eric Blischke
Remedial Project Managers

cc: John Crellin, ATSDR
Helen Hillman, NOAA
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